
A. SYSTEM DESCRIPTION

Authority: Office of Management Budget (OMB) Memorandum (M) 03-22, OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002 & PVR #10-Privacy Accountability and #21-Privacy Risk Management

Date of Submission: Aug. 22, 2012

PIA ID Number: 181

1. What type of system is this? New

1a. Is this a Federal Information Security Management Act (FISMA) reportable system? No

2. Full System Name, Acronym, and Release/Milestone (if appropriate):

Low Income Taxpayer Clinic, LITC

2a. Has the name of the system changed? No

If yes, please state the previous system name, acronym, and release/milestone (if appropriate):

3. Identify how many individuals the system contains information on

Number of Employees: Under 50,000

Number of Contractors: Not Applicable

Members of the Public: Not Applicable

4. Responsible Parties:

N/A

5. General Business Purpose of System

The database will contain data that covers the life cycle of a grant applicant. The data points in the system will be from applications, reports, LITC staff validations, and LITC staff analysis. The APTIFY database is needed because the current ACCESS database no longer meets our needs and continually corrupts which means data is lost and must be input again. In addition, the APTIFY system will allow the LITC Program Office to have better oversight of grantees by capturing their report data in one location and allowing us to run reports on grantees to see how they spent grant funds compared to their budget estimates. The database will allow us to compare work done by a grantee from year to year to identify trends and determine if a grantee is meeting program goals and requirements. Having access to this information in a central location will allow the LITC Program Office to make decisions on funding a grantee or if a grantee's contract needs to be terminated.

6. Has a PIA for this system, application, or database been submitted previously to the Office of Privacy Compliance? (If you do not know, please contact *Privacy and request a search) No

6a. If Yes, please indicate the date the latest PIA was approved:

6b. If Yes, please indicate which of the following changes occurred to require this update.

- System Change (1 or more of the 9 examples listed in OMB 03-22 applies) (refer to PIA Training Reference Guide for the list of system changes)
 - System is undergoing Security Assessment and Authorization
-

6c. State any changes that have occurred to the system since the last PIA

7. If this system has an Exhibit 53 or Exhibit 300 please provide the Unique Project Identifier (UPI) number (XXX-XX-XX-XX-XX-XXXX-XX). Otherwise, enter the word 'none' or 'NA'. NA

B. DATA CATEGORIZATION

Authority: OMB M 03-22 & PVR #23-PII Management

8. Does this system collect, display, store, maintain or disseminate Personally Identifiable Information (PII)? Yes

8a. If No, what types of information does the system collect, display, store, maintain or disseminate?

9. Indicate the category that best describes the source that provides or originates the PII collected, displayed, stored, maintained or disseminated by this system. Most common categories follow:

Taxpayers/Public/Tax Systems Yes
 Employees/Personnel/HR Systems Yes

Other Source: _____

Other No

10. Indicate all of the types of PII collected, displayed, stored, maintained or disseminated by this system. Then state if the PII collected is on the Public and/or Employees. Most common fields follow:

TYPE OF PII	Collected?	On Public?	On IRS Employees or Contractors?
Name	Yes	Yes	Yes
Social Security Number (SSN)	No	No	No
Tax Payer ID Number (TIN)	Yes	Yes	No
Address	Yes	Yes	No
Date of Birth	No	No	No

Additional Types of PII: Yes

<u>PII Name</u>	<u>On Public?</u>	<u>On Employee?</u>
Primary Contact Name	Yes	No
Primary Contact Phone	Yes	No
Primary Email	Yes	No
Applicant Mailing Address	Yes	No
Clinic Director Name	Yes	No
Clinic Director Phone	Yes	No
Clinic Director Email	Yes	No
Clinic Director Licenses/Certifications	Yes	No
Qualified Tax Expert Name	Yes	No
Qualified Tax Expert Phone	Yes	No
Qualified Tax Expert Email	Yes	No
Qualified Tax Expert Licenses/Certifications	Yes	No
Qualified Business Administrator Name	Yes	No
Qualified Business Administrator Phone	Yes	No
Qualified Business Administrator Email	Yes	No
Applicant Legal Name	Yes	No
Applicant Address	Yes	No
Applicant Contact Name	Yes	No
Applicant Contact Phone	Yes	No
Applicant Contact Email	Yes	No
Authorized Representative Name	Yes	No
Authorized Representative Phone	Yes	No
Authorized Representative Email	Yes	No
Additional Staff Name 1 (optional)	Yes	No
Additional Staff Phone 1 (optional)	Yes	No
Additional Staff Email 1 (optional)	Yes	No
Additional Staff Name 2 (optional)	Yes	No
Additional Staff Phone 2 (optional)	Yes	No

Additional Staff Email 2 (optional)	Yes	No
Additional Staff Name 3 (optional)	Yes	No
Additional Staff Phone 3 (optional)	Yes	No
Additional Staff Email 3 (optional)	Yes	No
Additional Staff Name 4 (optional)	Yes	No
Additional Staff Phone 4 (optional)	Yes	No
Additional Staff Email 4 (optional)	Yes	No
Name of Panel Member	No	Yes
Manager 1 Name	No	Yes
Manager 2 Name	No	Yes
Director Name	No	Yes
Analysis Name	No	Yes
LTA/Staff Name Visit	No	Yes
LITC Staff Name Visit	No	Yes
Presenter Name	No	Yes

10a. Briefly describe the PII available in the system referred to in question 10 above.

Low Income Taxpayer Clinic is an organization that receive grants to provide service to taxpayers. EIN of LITC organization, responsible people who run the clinic also employees within LITC who review and approve grants. Only names, phones and emails will be collected.

If you answered Yes to Social Security Number (SSN) in question 10, answer 10b, 10c, and 10d.

10b. Cite the authority that allows this system to contain SSN's? (e.g. specific regulations, statutes, etc.)

10c. What alternative solution to the use of the SSN has/or will be applied to this system? (e.g. masking, truncation, alternative identifier)

10d. Describe the planned mitigation strategy and forecasted implementation date to mitigate or eliminate the use of Social Security Numbers on this system?

11. Describe in detail the system's audit trail. State what data elements and fields are collected. Include employee log-in information. If the system does not have audit capabilities, explain why an audit trail is not needed.

Aptify 4.5 maintains a complete audit trail of all systemic actions taken (user or system based). Record Add/Edit/Delete Date and Time Stamp Administrators/Developers has access to each record to determine if the data (all fields that are in the system) has been added, deleted and/or altered and by who. Aptify 4.5 does not have login audit feature available.

11a. Does the audit trail contain the audit trail elements as required in current IRM 10.8.3 *Audit Logging Security Standards*? No

12. What are the sources of the PII in the system? Please indicate specific sources:

- a. **IRS files and databases:** No
If Yes, the system(s) are listed below:
No System Records found.
- b. **Other federal agency or agencies:** No
If Yes, please list the agency (or agencies) below:
- c. **State and local agency or agencies:** No

If Yes, please list the agency (or agencies) below:

d. Third party sources: Yes

If yes, the third party sources that were used are:

Form 13424, Form 424 The LITC program does not deal with taxpayers in the way the rest of the IRS does. We call the people we work with grantees or awardees. The form 13424 and 424 is submitted by the sponsoring organization and an authorized individual is required to sign the Form 424, Application for Assistance. A third party may put together the application and even write it, but only the authorized individual can sign the form.

e. Taxpayers (such as the 1040): No

f. Employees (such as the I-9): No

g. Other: No If Yes, specify:

C. PURPOSE OF COLLECTION

Authorities: OMB M 03-22 & Internal Revenue Manual (IRM) 10.8.8, IT Security, Live Data Protection Policy & PVR #16, Acceptable Use

13. What is the business need for the collection of PII in this system? Be specific.

Low Income Taxpayer Clinic database will be used to manage the LITC grant application process. All information filled using Application Form (Form 13424) will be feed into the system. The system will be used to assist LITC to review and rank applicants prior to approve the fund. We must be able to identify a grantee and associate them with the forms they submit including the application document and reporting forms. We must have this information to create an account for them in the HHS Payment Management System which allows them to download their awarded grant funds. We must have this information in order to issue award letters. We must be able to create an excel spreadsheet with this information and the funding information, that is rolled up to the IRS CFO and then posted on the USASPENDING site. We are required to make available grantee information to the public. We must be able to annually update the Pub 4134 which lists grantees names, public contact phone number, and the type of service they will provide. We must be able to annually create a table with grantees names and funded amounts for an IRS press release.

D. PII USAGE

Authority: OMB M 03-22 & PVR #16, Acceptable Use

14. What is the specific use(s) of the PII?

To conduct tax administration	<u>No</u>
To provide taxpayer services	<u>Yes</u>
To collect demographic data	<u>No</u>
For employee purposes	<u>Yes</u>

If other, what is the use?

Other: No

E. INFORMATION DISSEMINATION

Authority: OMB M 03-22 & PVR #14-Privacy Notice and #19-Authorizations

15. Will the information be shared outside the IRS? (for purposes such as computer matching, statistical purposes, etc.) Yes

15a. If yes, with whom will the information be shared? The specific parties are listed below:

	Yes/No	Who?	ISA OR MOU**?
Other federal agency (-ies)	Yes	OMB and Treasury	No
State and local agency (-ies)	No		
Third party sources	No		
Other:	No		

** Inter-agency agreement (ISA) or Memorandum of Understanding (MOU)

16. Does this system host a website for purposes of interacting with the public? No

17. Does the website use any means to track visitors' activity on the Internet?

If yes, please indicate means:

	YES/NO	AUTHORITY
Persistent Cookies	_____	_____
Web Beacons	_____	_____
Session Cookies	_____	_____
Other:	_____	<i>If other, specify:</i> _____

F. INDIVIDUAL CONSENT

Authority: OMB M 03-22 & PVR #15-Consent and #18-Individual Rights

18. Do individuals have the opportunity to decline to provide information or to consent to particular uses of the information? Not Applicable

18a. If Yes, how is their permission granted?

19. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action? Not Applicable

19a. If Yes, how does the system ensure "due process"?

20. Did any of the PII provided to this system originate from any IRS issued forms? Yes

20a. If Yes, please provide the corresponding form(s) number and name of the form.

<u>Form Number</u>	<u>Form Name</u>
Form 13424	Low Income Taxpayer Clinics (LITCs) Application Information
Form 13424-A	Low Income Taxpayer Clinic (LITC) Interim and Year-End Report General Information
Form 13424-B	Low Income Taxpayer Clinic (LITC) Interim and Year-End Report Controversy Issues
Form 13424-C	Low Income Taxpayer Clinics (LITCs) Advocacy Information
Form 13424-I	Low Income Taxpayer Clinics (LITCs) LITC Tax Information Authorization
Form 13424-K	Low Income Taxpayer Clinics (LITCs) Interim and Year-End Report Controversy Case Information

20b. If No, how was consent granted?

Written consent	<u>No</u>
Website Opt In or Out option	<u>No</u>
Published System of Records Notice in the Federal Register	_____
Other:	_____

G. INFORMATION PROTECTIONS

Authority: OMB M 03-22 & PVR #9-Privacy as Part of the Development Life Cycle, #11-Privacy Assurance, #12-Privacy Education and Training, #17-PII Data Quality, #20-Safeguards and #22-Security Measures

21. Identify the owner and operator of the system: IRS Owned and Operated

21a. If Contractor operated, has the business unit provided appropriate notification to execute the annual security review of the contractors, when required?

22. The following people have use of the system with the level of access specified:

	Yes/No	Access Level
IRS Employees:	<u>Yes</u>	
Users		<u>Read Write</u>
Managers		<u>Read Write</u>
System Administrators		<u>Read Write</u>
Developers		<u>Read Write</u>
Contractors:	<u>No</u>	
Contractor Users		<u></u>
Contractor System Administrators		<u></u>
Contractor Developers		<u></u>
Other:	<u>No</u>	<u></u>

If you answered yes to contractors, please answer 22a. (All contractor/contractor employees must hold at minimum, a "Moderate Risk" Background Investigation if they have access to IRS owned SBU/PII data.)

22a. If the contractors or contractor employees act as System Administrators or have "Root Access", does that person hold a properly adjudicated "High Level" background investigation?

23. How is access to the PII determined and by whom?

All employees of the LITC program will require access to the PII information to carry out everyday duties which includes input of and analysis of the data. Access to LITC system will be determined and approved by LITC management then OL5081 will be done and approved by management within the Business Systems Planning. Once access is approved, administrator will add the user to the system granting access (the system uses window integrated security). When access is no longer needed, OL5081 will be submitted request to be deleted from the system with approval of LITC management/BSP management.

24. How will each data element of SBU/PII be verified for accuracy, timeliness, and completeness?

The LITC program reviews the data submitted and if it does not appear to be correct, the submitter is contacted and corrections made as necessary. Additionally, the LITC program asks the submitters to validate the information we have on record for them is correct. The name and EIN are validated when the compliance check is completed via IDRS. The DUNS number is validated via the CCR system. The clinic name, address and contact phone numbers are validated by the grantee. We ask grantees to verify the information is correct by posting the LITC Toolkit which is password protected and can only be accessed by LITC staff and grantees.

25. Are these records covered under the General Records Schedule (GRS), or have a National Archives and Records Administration (NARA) archivist approved a Record Control Schedule (RCS) for the retention and destruction of official agency records stored in this system? Yes

25a. If Yes, how long are the records required to be held under the corresponding RCS and how are they disposed of? In your response, please include the complete IRM number 1.15.XX and specific item number and title.

1. Rejected grant applications Cut off at end of calendar year (in which application is rejected). Destroy 3 year after cutoff. 2. Accepted grant applications. Cut off at end of calendar year (in which grant program period ends). Retire to Records Center 1 year after cut off. Destroy 6 years, 3 months after cutoff. IRM 1.15.9 Records Control Schedule for Taxpayer Advocate New Item 14: Low Income Taxpayer Clinic (LITC) Grant Files

If **No**, how long are you proposing to retain the records? Please note, if you answered no, you must contact the IRS Records and Information Management Program to initiate records retention scheduling before you dispose of any records in this system.

26. Describe how the PII data in this system is secured, including appropriate administrative and technical controls utilized.

Aptify uses a secure enterprise application architecture. Aptify applications security is applied at the database layer, the business logic layer, and at the presentation layer. The process provides specific and customized roles and permissions to the database by users while disallowing user access from information they are not authorized for. The Aptify security technology includes highly granular security controls including field level security, row-set security, and rules based authorization technology. The system is housed on an IRS secure server and there will be no data transmission outside the IRS firewall.

26a. Next, explain how the data is protected in the system at rest, in flight, or in transition.

N/A – data will remain in the server behind the IRS firewall and restricted to LITC staff/reviewers.

27. Has a risk assessment (e.g., SA&A) been conducted on the system to ensure that appropriate security controls have been identified and implemented to protect against known risks to the confidentiality, integrity and availability of the PII? No

28. Describe the monitoring/evaluating activities undertaken on a regular basis to ensure that controls continue to work properly in safeguarding the PII.

Business Objects Audit Reports will be used to monitor and evaluate user activities and to safeguard PII data within the system. Upon completion of the system, we will implement procedures (audit reports).

29. Is testing performed, in accordance with Internal Revenue Manual (IRM) 10.8.8 – IT Security, Live Data Protection Policy? Not Applicable

29a. Has approval been received from the Office of Privacy Compliance to use Live Data in testing (if appropriate)?

29b. If you have received permission from the Office of Privacy Compliance to use Live Data, when was the approval granted?

H. PRIVACY ACT & SYSTEM OF RECORDS

Under the statute, any employee who knowingly and willfully maintains a system of records without meeting the Privacy Act notice requirements is guilty of a misdemeanor and may be fined up to \$5000.

Authority: OMB M 03-22 & Privacy Act, 5 U.S.C. 552a (e) (4) & PVR #13-Transparency

30. Are 10 or more records containing PII maintained/stored/transmitted through this system? Yes

31. Are records on the system retrieved by any identifier for an individual? (Examples of identifiers include but are not limited to Name, SSN, Photograph, IP Address) Yes

31a. If YES, the System of Records Notice(s) (SORN) published in the Federal Register adequately describes the records as required by the Privacy Act? Enter the SORN number and the complete name of the SORN.

<u>SORNS Number</u>	<u>SORNS Name</u>
Treasury/IRS 10.004	Stakeholder Relationship Management and Subject Fi
Treas/IRS 36.003	General Personnel and Payroll Records (covers empl
Treasury/IRS 00.003	Taxpayer Advocate Service and Customer Feedback an
Treas/IRS 34.037	IRS Audit trail and security records system (cover

Comments

Treasury/IRS 10.004 Stakeholder Relationship Management and Subject Files (covers Individuals who have stakeholder relationships with the IRS, including individuals who attend IRS forums and educational outreach meetings). Treas/IRS 36.003 General Personnel and Payroll Records (covers employee travel records) Treasury/IRS 00.003 Taxpayer Advocate Service and Customer Feedback and Survey Records (covers records about TAS stakeholders) and Treas/IRS 34.037 IRS Audit trail and security records system (covers audit trail for the system)

I. ANALYSIS

Authority: OMB M 03-22 & PVR #21-Privacy Risk Management

32. What choices were made or actions taken regarding this IT system or collection of information as a result of preparing the PIA?

Resulted in the removal of PII from the system (e.g., SSN use reduced/eliminated)	<u>No</u>
Provided viable alternatives to the use of PII within the system	<u>No</u>
New privacy measures have been considered/implemented	<u>No</u>
Other:	<u>No</u>

32a. If Yes to any of the above, please describe:

N/A

[View other PIAs on IRS.gov](#)